

Remarks

Claims 1-2, 4-19, and 21-24, and 26 are pending and stand finally rejected. Specifically, claims 1, 2, 4, 5, 10, 11, 14, 15, and 26 were rejected under 35 U.S.C. 103(a) as being unpatentable over Rye et al. ("Rye") in view of Monroe. Claims 6, 7, and 16-18 were rejected under 35 U.S.C. 103(a) as being unpatentable over Rye in view of Ogasawara. Claims 8, 9, 12-13, 19, and 21-24 were rejected under 35 U.S.C. 103(a) as being unpatentable over Rye and Ogasawara in view of Bellman, Jr. et al. ("Bellman"). These rejections are respectfully traversed.

Claim 1 recites a system for switching between a plurality of video cameras **without a multiplexing device** such that a video signal from **only one** of the plurality of video cameras is output at any given time, the system comprising:

a camera controller for controlling the plurality of video cameras;

a plurality of physically-separate, addressable power switches, wherein each addressable power switch is coupled to and controls power applied to a corresponding video camera; wherein **each addressable power switch comprises a different wireless receiver** for receiving a control signal to either supply or switch off power to the corresponding video camera;

an output device capable of receiving a video signal from any of the plurality of video cameras and configured to output the video signal received; and

a switch controller controlled by the camera controller for addressing the plurality of addressable power switches, wherein the switch controller comprises a wireless transmitter for transmitting the control signals to the addressable power switches **such that power is applied to only a single selected video camera.**

These claimed features facilitate switching between a plurality of video cameras without a multiplexing device and without a wired network to control the power switches, allowing for unlimited expansion of the number of cameras,

enhanced flexibility of camera placement, and support for cameras operating from a DC source (battery).

Rye and Monroe Teach Away from the Claimed Invention and Each Other Negating the Plausibility of their being Combined by One of Ordinary Skill in the Art

Rye teaches away from including a *different* wireless receiver for each addressable power switch. Beyond the fact that Rye only illustrates a single "smart transceiver" 24, Rye states that "camera control signals are preferably in the form of binary-coded signals received by the control modules from a "smart" transceiver via a common connection to the home a.c. power line in a manner similar to that described in U.S. Pat. No. 6,229,443." Col. 2, lines 27-31 (emphasis added). By teaching a preference a single smart transceiver, which utilizes the home AC power line via a "common connection" to distribute control signals to the cameras, Rye teaches away from the claimed limitation of "each addressable power switch [comprising] a different wireless receiver for receiving a control signal to either supply or switch off power to the corresponding video camera." The claimed invention is about having multiple connection paths to a plurality of wireless cameras, not a single, "common" connection path, as in Rye.

Monroe likewise teaches away from the claimed invention. While Monroe arguably teaches a plurality of transceivers, his system is the antithesis of the claimed invention. The purpose of the claimed invention is to allow "switching between a plurality of video cameras *without a multiplexing device* such that a *video signal from only one of the plurality of video cameras is output at any given time.*"

However, contrary to the claimed invention, Monroe teaches that "multiple audio and image signals are multiplexed and sequenced utilizing split screen technology in order to minimize the recording and monitoring hardware required to process the images." Abstract (emphasis added). In other words, Monroe uses a video multiplexer at the receiving side to combine multiple video images received from different aircraft into a split screen view. This is precisely what the claimed invention was trying to avoid, and directly teaches against the claimed limitations "without a multiplexing device" and "only one of the plurality of video cameras is output at any given time."

Moreover, Monroe cannot apply "***power ... to only a single selected video camera,***" as claimed, or there would be times certain aircraft would not be protected. Monroe is concerned about providing around-the-clock monitoring of multiple aircraft. For example, Monroe states that "captured data and images ... may be recorded on a 'black box' recorder as well as on a ground based recording station." If certain cameras were powered down, as claimed, there would be gaps in the black box telemetry, making it difficult to reconstruct events preceding an act of terrorism, for example. In Monroe, continuous monitoring of all aircraft is not only important, it is essential.

One of ordinary skill interested in building a video multiplexing system, as in Rye, would not turn to a reference that is the antithesis of video multiplexing, i.e., continuous monitoring of video feeds from a plurality of aircraft. Likewise, one of ordinary skill in the art desiring to build a video multiplexer in which only a single

video camera is to be active at a given time would not turn to a reference in which all video cameras must, of a necessity, be active at all times.

Similarly, one of ordinary skill in the art interested in building a continuous monitoring system, as in Monroe, would not turn to a reference in which only a single video camera is active. Additionally, one of ordinary skill in the art interested in building a system for monitoring events in a plurality of aircraft would not turn to Rye, which only shows a single transceiver. Using a single transceiver controlling video cameras in a plurality of aircraft would be impossible, since there is no other means to communicate with the cameras in each aircraft (i.e., there is no wired AC network, as in Rye).

Accordingly, the applicants respectfully submit that claim 1 is patentably distinct over the cited references. Claims 11, 19, and 24 include similar limitations and are likewise patentably distinct for at least the same reasons.

Rye Does Not Teach or Suggest an Addressable Power Switch that is Embedded Within a Corresponding Video Camera

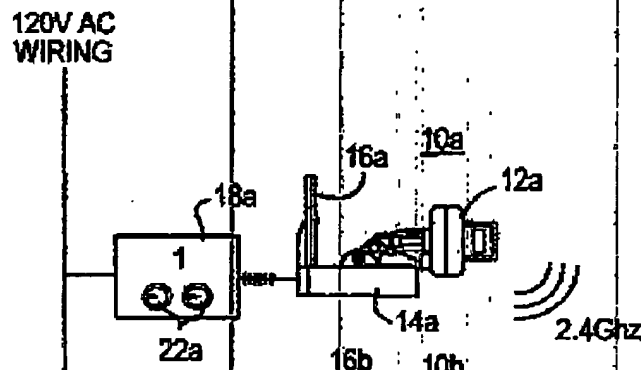
In response to the applicants' arguments that Rye does not teach the claimed power switch "embedded within" a corresponding video camera, the Examiner argues that "Rye et al. teaches wherein at least one addressable power switch is embedded with a corresponding video camera (18a is an 'integral part of a whole' of the camera device)." Office Action at Page 3.

First, the above statement misquotes the claim language, i.e., "embedded with" as opposed to "embedded within." To the extent that the Examiner interprets embedded to mean "coupled," such an interpretation would make even less sense in

the case of the preposition "within." The preposition is important because even if the Examiner is right about the word "embedded," the fact that something is "within" something else is different from something being "with" something else. In this case, there is no teaching Rye's power switch being "within" the camera component.

Second, the quoted phrase "integral part of a whole" is not found in Rye. If the Examiner meant to use other words in the quotation, the applicant respectfully submits that the Examiner point to the actual portion of Rye supporting the rejection.

Third, if the Examiner is simply offering an opinion that the addressable control module 18a is an integral part of the camera 12a, the applicants respectfully submit that the figures and description in Rye contradict this opinion. FIG 1 of Rye, a portion of which is reproduced below, clearly shows that the addressable control module 18a is not an integral part of the camera 12a.



As illustrated, the addressable control module 18a is connected by a wire to the wireless video sender 14a. According to the specification, "camera 12a is preferably plugged into wireless video sender 14a." Normally, when a first thing (camera) is plugged into a second thing (wireless video sender), the second thing is not considered to be "embedded within" the first thing. For example, if a power cable is

plugged into an outlet, the outlet is not referred to as being "embedded within" the power cable. Thus, even the wireless video sender 14a, which is shown next to the camera 12a, would not be considered to be "embedded within" the camera 12a, because the camera 12a is "plugged into" the wireless video sender 14a. If the wireless video sender 14a is not embedded within the camera 12a, how, then, could the addressable control module 18a be embedded within the camera 12a, given that the addressable control module 18a is merely connected by a wire to the wireless video sender 14a?

The applicant respectfully submits, therefore, that claim 2 is patentably distinct over the cited references.

In view of the foregoing amendments and remarks, the applicant respectfully submits that all claims are in condition for allowance. A Notice of Allowance is respectfully solicited.

Respectfully submitted,

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